

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with N.J.N. JBR 9004-2(c)

Holly S. Miller (No. 2006-03052)
Gellert Seitz Busenkell & Brown, LLC
901 Market Street, Suite 3020
Philadelphia, PA 19107
Phone: (215) 238-0012
Fax: (215)-238-0016
Email: hsmiller@gsbblaw.com

*Counsel for Zurich American Insurance Company
and its affiliates*

In re:

ORBIT ENERGY & POWER, LLC,

Debtor.

Chapter 7

Case No. 22-19628-ABA

NOTICE OF MOTION

PLEASE TAKE NOTICE that on **August 27, 2024 at 2:00 p.m.**, or as soon as counsel may be heard, the undersigned will move before the UNITED STATES BANKRUPTCY COURT, Honorable Andrew B. Altenburg, Jr. presiding, 400 Cooper Street, Courtroom 4B, Camden, NJ 08101, for an Order Granting Zurich American Insurance Company's ("Movant") Motion for Allowance and Payment of Chapter 7 and Chapter 11 Administrative Expense Claim.

PLEASE TAKE FURTHER NOTICE that the Movant will rely upon the enclosed Motion, Exhibits and Proposed Order, in support of the relief sought.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing; (ii) state with particularity the basis of the objection; and (iii) be filed with the Clerk of the United States Bankruptcy in accordance with D.N.J. LBR 9013-2.

PLEASE TAKE FURTHER NOTICE that oral argument is hereby waived unless timely objection is received.

Dated: 7/26/2024

GELLERT SEITZ BUSENKELL & BROWN, LLC

By: /s/ Holly S. Miller
Holly S. Miller, Esquire
901 Market Street, Suite 3020
Philadelphia, PA 19107
Telephone: (215) 238-0010
Facsimile: (215) 238-0016
Email: hsmiller@gsbblaw.com

*Counsel for Zurich American Insurance
Company and its affiliates*